

Re: 22 CFR part 96 (State/AR-01/96)

From: Andrew Kearns

7 Grouse Ridge Way

Greenville, SC 29617

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I am very concerned about the effect these proposed regulations may have on adoptive parents and the adoption agencies that serve them. While the goals of the Hague Convention are laudable and the proposed regulations have some good things, I believe that insufficient consideration has been given to the cost of their implementation, especially for smaller adoption agencies. The estimated cost for the initial accreditation process is as high as \$50,000 and the annual accreditation requirement may run to thousands of dollars each year. The requirement that homestudies be conducted by persons with a Master's in social work or a related field may delay the process and significantly increase the cost as qualified persons will not be readily available in many parts of the country. There is also at present no market for the kind of liability insurance required, which is likely to be very expensive for agencies. All of these costs, of course, will be passed on to adoptive parents, who will wind up paying even more for an intercountry adoption. And I am afraid that many small adoption agencies will not be able to meet the costs of accreditation and continuing to facilitate adoptions in Convention countries. I therefore ask for a careful reconsideration of these regulations, with an eye to providing more flexibility.

This issue is important to me because my wife and I are in the process of adopting a baby from Guatemala. We chose an agency in a nearby town because it had experience with intercountry adoptions and its director is highly regarded by the adoption community in this state. They also provide a number of services to adoptive parents, including a multicultural summer camp; we know that we will have a support network and not merely given a baby with a "have a good life." It is the very kind of small agency that will probably be most affected by the proposed rules. I fear that if not modified, intercountry adoption will end up in the hands of a few large, impersonal, out-of-state agencies.